

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

Commodity Futures Trading Commission,)	
)	
Plaintiff,)	
)	Civil Action No. 3:23-cv-11808
v.)	
)	
Traders Global Group Inc., a New Jersey)	Judge Zahid N. Quraishi
corporation, d/b/a “My Forex Funds”;)	
Traders Global Group Inc., a Canadian)	
business organization; and Murtuza)	
Kazmi,)	
)	
Defendants.)	

**Stipulation and Joint Motion to Extend Statutory Restraining Order
and Continue Preliminary Injunction Hearing**

The Commodity Futures Trading Commission (“CFTC”), by and through its counsel, and Defendants Traders Global Group Inc., a New Jersey corporation; Traders Global Group Inc., a Canadian business organization; and Murtuza Kazmi (hereinafter “Defendants”), by and through their counsel, hereby stipulate and jointly move the Court to extend the Statutory Restraining Order (Dkt. 13) to expire on September 26, 2023 and continue the preliminary injunction hearing for two weeks.

In support, the CFTC and Defendants stipulate as follows:

1. On August 29, 2023, the Court entered a Statutory Restraining Order. (Dkt. 13.)
2. Currently, the Statutory Restraining Order expires on September 12, 2023. (*Id.*)

3. The Court also set a preliminary injunction hearing on the CFTC's Motion for a Preliminary Injunction (Dkt. 7) for September 11, 2023 at 3:00 pm. (Dkt. 13.)

4. Pursuant to Federal Rule of Civil Procedure 65(b)(2), a court has authority, "for good cause," to extend the expiration of a restraining order by fourteen days. Fed. R. Civ. P. 65(b)(2).

5. Here, good cause exists to extend the expiration of the Statutory Restraining Order by fourteen days to allow counsel for the parties to engage in further discussions and determine whether they can reach an agreement on the CFTC's request for a preliminary injunction (Dkt. 7) without the need for a preliminary injunction hearing. Further, in the event there is a need for a preliminary injunction hearing, extending the Statutory Restraining Order by fourteen days and continuing the preliminary injunction hearing date will give the Court time to review any additional pleadings or evidence the parties may file related to that hearing.

WHEREFORE, the parties hereby jointly move the Court to enter an order pursuant to Rule 65(b)(2) extending the Statutory Restraining Order expiration date to September 26, 2023 and continuing the preliminary injunction hearing to a date shortly before September 26, 2023.

Pursuant to Local Rule 12(c), the submitting attorney certifies that each of the signatories below has expressly agreed to the form and substance of this document and has authorized the filing attorney to submit the document electronically.

September 7, 2023

Respectfully Submitted,

s/ Katherine S. Paulson

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September 7, 2023

Agreed and Stipulated to By,

s/ Anthony J. Staltari

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